101 Convention Center Drive, Suite 700
Las Vegas, NV 89109
Tel. 888.512.0888 Fax 702.221.0904

July 10, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: COMPLIANCE LETTER
WC Doc. No. 05-196, 04-36

Dear Ms. Dortch:

INTRATEL, LLC (hereinafter referred to as ILLC) hereby submits this "Compliance Letter" in accordance with the FCC's Voice Over Internet Protocol ("VoIP")911 Order[1] and the Enforcement Bureau's November 7, 2005 Public Notice concerning the compliance letter requirements for interconnected VoIP service Providers[2].

ILLC is a Section 214 licensed facilities based carrier with a National Operations Center ("NOC") on the Global Crossing Worldwide IP Network. ILLC plans to offer "Interconnected VoIP Services", as that term is defined in the Commission's VoIP 911 Order and Commission Rules 9.5, shortly. In anticipation of the launch of this service, ILLC is filing this Compliance Letter.

Nature of Service

In contrast to the traditional VoIP services offered by others, ILLC's service offering is totally software based without the need for a fixed location, Analog to Digital Converter or Device associated with a relevant geographic

---

[1]In re IP-Enabled Services, E911 requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (rel June 3, 2005)

[2]Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters, Public Notice, DA 05-295 (rel. Nov. 7, 2005)

telephone number assigned by an existing rate center. The service offering is a combined Audio-Video System with a bi-directional IP Telephony feature that interfaces to the PSTN through ILLC's Patented IP to PSTN to IP Gateway and a Directory Server. The service operates for both fixed site

and Nomadic Subscribers and will be offered to Business and Residential customers nationwide.

E911 Technical Solution

In order to assist the Commission's understanding of this system's technology and how it meets the E911 requirements, a brief technical explanation follows:

A. ILLC's E911 solution is designed to address the need to reach the proper Public Safety Answering Point (PSAP) when the emergency call is made from a personal computing device (PC or PDA) whose geographical location changes (ie: Nomadic use). The process used to make this call must interface seamlessly to the existing PSAP's equipment, infrastructure, operational constraints and configurations. When the call is made, the PC or PDA becomes a virtual implementation of a conventional telephony device (i.e. telephone) capable of PC to Phone and Phone to PC operation.

B. The solution is accomplished by the integration of a software component running on the Subscriber's PC or PDA, ILLC's Patented IP to PSTN Gateways, a database that contains subscriber's dynamically changing location information, an Intratel Directory Server, a map location database and routing hardware used to route the call.

E911 Operational Solution

ILLC's E911 Solution enables either a fixed location or a nomadic subscriber to make an emergency 911 call from his or her PC or PDA device. The system includes the collection of subscriber location data either manually or automatically, if the subscriber has a GPS receiver that is associated with the PC or PDA device. During every log on, the subscriber is required to enter their current location either manually or the location information is collected automatically via an interface with an associated GPS receiver and the Intratel software checks the location information in order to ascertain if the location is verifiable. If so, the subscriber's location is provisioned to the ALI database. This allows ILLC to properly rout the emergency call to the appropriate PSAP associated with the subscriber's current geographical location. If not, the system defaults the subscriber's location to an

unverifiable location and the subscriber is notified that the address cannot be verified and that any 911 call will be routed to an Emergency Caller Relay Center (ECRC).

As stated above, the software component is resident on the subscriber's PC or PDA and provides a virtual telephone interface for outgoing and incoming calls to the PSTN from a PC or PDA device connected to the public internet or an equivalent private network. ILLC's Patented IP to PSTN Gateway bridges the PC or PDA's IP network interface and associated specialized packet structure and converts it to an ITU standard PSTN switch interface (i.e. T1, T3, etc.). The ALI database, which is updated each time the subscriber changes location and logs on to the ILLC system, holds the most recently verified location information for the subscriber. The ILLC IDS Server provides administration

and IP routing control for the entire process. ILLC has contracted with Telefinity Dash911 to provide the interface to the E911 PSAP network as it exists today.

The combination of the ILLC System and the V9-1-1™ solution enabled by Telefinity Dash911 through Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation,
ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP).
Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911 thereby enabling ILLC to take advantage of a full end-to-end solution from one E911 service provider.

The only VSP requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Telefinity Dash911 via a real-time interface and the PSTN connectivity to the Telefinity Dash911 network to enable live 9-1-1 call delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash 911 to its VSP customers, or, a branded website interface provided by Telefinity Dash911 to it's VSP customers. As shown above, this is accomplished through the interface of the ILLC Gateway with the Telefinity Dash911 Network. In order to verify the accuracy and operations of our solution, ILLC conducted a series of tests with Telefinity Dash911 and an operational PSAP and on June 21, 2006 ILLC was certified as an E911 VoIP Provider by Telefinity Dash911.

911 Routing Information/Connectivity to Wireline E911 Network

ILLC will interconnect with the Wireline E911 network through its contractual Agreement with Telefinity Dash911. Pursuant to that agreement, ILLC will hand off the 911 call to Telefinity Dash911 which will then transmit all 911 calls to the appropriate PSAP. Currently each of Telefinity Dash911's VSP customers had access to 154 E9-1-1 Selective Routers on or about November 28th, 2005 and the attached "Major Market Deployment Map", Basic PSAP Map and the "VoIP Deployment Plan" reflect the market deployment schedules. Note: the market deployment map represent major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

911 Coverage

ILLC will have the capability for full compliance with the VoIP 911 Order in 100% of its service areas when ILLC launches the service. This is made possible by its Nomadic service capabilities and its relationship with Telefinity Dash911.

Transmission of ANI and Registered Location Information

As has been described above, the ILLC service will collect the subscriber's location information upon registering for service. This initial information will serve as the Registered location information until changed by the Subscriber. Upon registration, each new ILLC subscriber will be assigned a Ten Digit phone number, obtained from the North American Numbering Plan Administrator. This number will be assigned to the subscriber irrespective of their physical location at the time of registration and will be used, along with other data as the unique identifier for the subscriber at all times. This number remains resident in the Intratel Directory Services. As cited above, ILLC will interconnect with the Wireline E911 network through its contractual Agreement with Telefinity Dash911, which will then transmit all 911 calls to the appropriate PSAP.

Obtaining of Initial Registered Location Information

AS initially stated, ILLC's Interconnected VoIP Service is a planned offering. Consequently, ILLC has no existing VoIP Subscribers. However, once the service is launched, ILLC will obtain the initial Registered Location

information as described immediately above from 100% of its subscribers prior to the initiation of service to the subscriber.

Obtaining Updated Registered Location Information

As outlined above, during every log on, subscriber location information is updated because the subscriber is required to enter their current location either manually or the location information is collected automatically via an interface with an associated GPS receiver. The Intratel software checks the location information in order to ascertain if the location is verifiable. If so, the subscriber's location information is updated to the ALI database. This allows ILLC to properly rout the emergency call to the appropriate PSAP associated with the subscriber's current geographical location. If not, the system defaults the subscriber's location to an unverifiable location and the subscriber is notified that the address cannot be verified and that any 911 call will be routed to an Emergency Caller Relay Center (ECRC). The Subscriber has the ability to correct any error in location and re-input the correct data.

Technical Solution for Nomadic Subscribers

The proposed ILLC offering is by definition a technical solution for Nomadic Subscribers. The subscriber's current location is provisioned at all times in the ALI or defaulted to call the Intrado ECRC, if the location cannot be verified. The system has the capability to provide direct Audio-Video communications with every PSAP, if they were equipped with a work station with a direct connection to the internet, that is provisioned with the Intratel Software and if desired, a camera installed. The PSAP could either hand off to or conference in the designated responding emergency personnel, if also equipped

with the Intratel Solution, who would have direct contact with the party needing assistance.

It must be noted, that this technology is available and deployable now.

Should you require additional information or have any questions, please contact the undersigned at your convenience.

Respectfully Submitted,

Robert L. Kinkle

ROBERT L. KINKLE, ESQ.
Exec VP, General Counsel
COO Global Operations
INTRATEL, LLC
Tel: 888-512-0888
mailto:rkinkle@intratel.com

RLK/st

Enclos

cc: Kathy Berthot, Deputy Chief, Spectrum Enforcement Bureau
Janice Myles, Competition Policy Division
Best Copy and Printing, Inc.